

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)
 V.)
SHAWN WINBUSH)

Motion for Two Day Extension to Submit Responses to Motions

Defendant Shawn Winbush filed a motion to suppress and a motion for revocation of the Magistrate Judge's detention order. The government's response to both motions is due on Monday, April 18, 2005. Counsel for the government respectfully requests an extension of time until Wednesday, April 20, 2005. As grounds therefor, the undersigned attorney asserts that she wishes to confer with agency counsel prior to filing the final response and has not yet done so as to the final document. The undersigned counsel will be out of the office on Patriot's Day, and therefore requests this short extension.

Respectfully Submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/Nancy Rue
Nancy Rue
Assistant U.S. Attorney